



August 1, 2013

FILED ELECTRONICALLY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street N.W.
Washington, D.C. 20544

Re: Notice of *Ex Parte* Presentation – IB Docket No. 12-267
Comprehensive Review of Licensing and Operating Rules for Satellite Services

Dear Ms. Dortch:

On July 30, 2013, representatives of the Satellite Industry Association (“SIA”)¹ met with Courtney Reinhard, Legal Advisor to Commissioner Pai, and Priscilla Delgado Argeris, Legal Advisor to Commissioner Rosenworcel, to discuss the U.S. satellite industry’s views on an item included on the Commission’s tentative agenda for the August Open Meeting that would significantly revise Part 25 of the Commission’s rules, which govern space station and earth station licensing and operation (IB Docket No. 12-267) (the “Part 25 NPRM”).

¹ SIA is a U.S.-based trade association providing worldwide representation of the leading satellite operators, service providers, manufacturers, launch services providers, and ground equipment suppliers. Since its creation more than eighteen years ago, SIA has advocated for the unified voice of the U.S. satellite industry on policy, regulatory, and legislative issues affecting the satellite business. For more information, visit www.sia.org. SIA Executive Members include: Artel, LLC; The Boeing Company; The DIRECTV Group; EchoStar Satellite Services LLC; Harris CapRock Communications; Hughes Network Systems, LLC; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; LightSquared; Lockheed Martin Corporation.; Northrop Grumman Corporation; Rockwell Collins Government Systems; SES Americom, Inc.; and SSL. SIA Associate Members include: AIS Engineering, Inc.; Astrium Services Government, Inc.; ATK Inc.; Cisco; Cobham SATCOM Land Systems; Comtech EF Data Corp.; DRS Technologies, Inc.; Encompass Government Solutions; Eutelsat, Inc.; Globecom Systems, Inc.; Inmarsat, Inc.; ITT Exelis; Marshall Communications Corporation.; MTN Government Services; NewSat America, Inc.; O3b Networks; Orbital Sciences Corporation; Panasonic Avionics Corporation; Spacecom, Ltd.; Row 44; Spacenet Inc.; TeleCommunication Systems, Inc.; Telesat Canada; The SI Organization, Inc.; TrustComm, Inc.; Ultisat, Inc.; ViaSat, Inc., and XTAR, LLC.

The following SIA representatives attended the meetings: Sam Black, Satellite Industry Association; Susan Crandall, Intelsat Corporation; Daniel Mah, SES; Steven Doiron, EchoStar; Joslyn Read, O3b Networks; Chris Murphy, Inmarsat; and Joe Godles of Goldberg, Godles, Wiener & Wright (representing Iridium).

During these meetings, the SIA representatives expressed appreciation for the hard work of the International Bureau staff on this item, and their willingness to listen to input from industry stakeholders on how to improve Part 25. The Part 25 rules are extremely complex, and have not been systematically reviewed and updated in many years. The record reflects broad consensus on many of the issues in the NPRM, and SIA representatives are hopeful that with this latest revision, the rules will now take account of the many new and innovative satellite technologies – including spot beams, on-board signal processing, and shapeable beams – that have been developed since the last major rule update. The SIA representatives are also hopeful that the item will make licensing more efficient by removing redundancies and inconsistencies from the existing rules.

The SIA representatives also discussed with the Commissioners' staff the possibility of additional changes in the future that could be made to further streamline the satellite licensing process. Because of space stations' ability to cover entire continents with a single beam, satellite companies have experience with the regulatory approaches of many different countries. Lessons can be learned from the regulatory systems of other countries on how the Commission's own processes and rules can be further improved, consistent with the framework of the Communications Act, and without diminishing the Commission's public interest and consumer protection responsibilities. SIA representatives suggested that such a comparative analysis could be the subject of a future FCC rulemaking.

The SIA representatives concluded by expressing their hope that the item will receive a positive vote at the Commission Meeting.

A copy of this notice is being emailed to the Federal Communications Commission staff identified below. Please contact Patricia Cooper if you have any questions.

Respectfully submitted,

/s/

SATELLITE INDUSTRY ASSOCIATION

A handwritten signature in black ink, appearing to read "Patricia Cooper". The signature is fluid and cursive, with the first name "Patricia" being more prominent than the last name "Cooper".

Patricia Cooper, President
1200 18th St., N.W.
Suite 1001
Washington, D.C. 20036
U.S.A.

Attachment

cc (via email):

Courtney Reinhard, Office of Commissioner Pai
Priscilla Delgado Argeris, Office of Commissioner Rosenworcel